

IN THE DISTRICT COURT OF THE
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 00-6255-CR

-VS-

JUDGE: FERGUSON

GREGORY LAWRENCE,
a/k/a Frankie LaFontant,

Defendant.


MOTION FOR EARLY TERMINATION

COMES NOW the Defendant, by and through undersigned counsel, who moves this Honorable Court to modify the sentence originally imposed in this matter by terminating the Defendant's supervised release sentence.

AS GOOD GROUNDS for the foregoing Motion, the Defendant states the following:

1. In 2000, this Court imposed a sentence in this case that mandated a federal prison sentence to be followed by three years of supervised release.
2. The Defendant was in federal prison until April 19, 2001, when he was referred to the immigration authorities.
3. The Defendant was released from the INS hold on June 5, 2002, when he provided proof that his strong arm robbery conviction in the state courts had been set aside.

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4. The Defendant, therefore, has successfully completed almost two years of the supervised release requirement in this case. Since being placed on supervised release, the Defendant has carefully complied with all the conditions and requirements placed upon him, including drug testing. The Defendant has successfully complied with all conditions and restrictions under supervised release. The Defendant has paid all fines and costs in this case.
5. The Defendant's community control officer, STEVEN AASTERUD, advises that, due to his Department policy, he is opposed to early termination in this case, but did confirm that the Defendant has met all of his conditions of supervision and has not done anything to violate supervised release.

WHEREFORE, the Defendant respectfully requests that this Honorable Court grant the foregoing Motion and modify the sentence in the manner requested by this Motion by granting an early termination of the Defendant's supervised release.

LOCAL RULE 88.9 CERTIFICATE

I HEREBY CERTIFY that I have contacted Scott Behnke, Esq., the AUSA prosecuting this case, and he has stated that he concurs with the position of the United States Probation Office.

Respectfully Submitted,

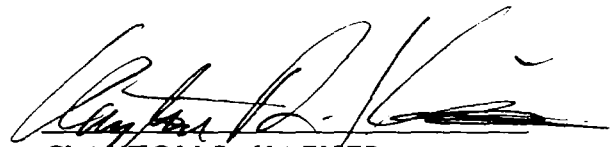
CLAYTON R. KAEISER, ESQ.

Attorney for Defendant
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Miami, Florida 33145
(305) 371-4989
(305) 371-4986 (facsimile)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was hand-delivered to AUSA Scott Behnke, 500 East Broward Blvd., Suite 700, Fort Lauderdale, Florida 33301, and to Steven Aasterud, United States Probation Office, 299 E. Broward Blvd., Suite 409, Fort Lauderdale, Fla. 33301-1865, this 27th day of March, 2003.

BY:


CLAYTON R. KAEISER
Florida Bar No. 348120